

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



✓ R02588
R0749

October 29, 1991

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

Mr. Marty Ryder
Pacific Bell
666 Folsom St., Room 1225
San Francisco, CA 94107

Re: Requirements for the Permitting of the Underground Storage Tank
at 1189 58th St., Oakland CA 94621

Dear Mr. Ryder:

On October 18, 1991, Barney Chan, Hazardous Materials Specialist, from this office performed an inspection of the above facility to determine compliance with hazardous materials laws and regulations. This facility is subject to three programs which our office oversees: the inspection of generators of hazardous waste, the inspection of businesses which store hazardous materials and therefore require the submission of Hazardous Material Management Plans (aka Business Plans) and the inspection of businesses which have underground tanks for the purposes of permitting their use.

In general, the violations noted in the inspection report can be corrected and the recommended practices should be implemented as company policy from this time henceforth. However, as promised to Mr. Vellenweth and Mr. Ebert at the time of the inspection, I will outline the current requirements for the monitoring and operation of the underground tank at this facility.

Our records indicate that at this site is a 8000 gallon, single walled fibreglass tank. You currently perform an annual tank precision test and have a Veeder Root TLS 250 tank gauging device which is monitored by your Fresno office. In accordance to the newly revised Title 23, California Code of Regulations (CCR), August 1991 version you have the following monitoring alternatives:

1. Section 2643- Perform an annual precision test and monthly inventory reconciliation. (See item 2 for specifics) and for suction piping delivery systems, as is in your case, you must perform line tightness testing once every three years or:
2. Section 2646- Perform daily inventory reconciliation, the difference between physically measured inventory and the calculated inventory. Daily variations shall be summed for a period of one month. Monthly variation of 1% of the monthly tank delivery plus 130 gallons must be investigated in accordance with this section. You must also submit on an annual basis, a statement to our office which states that all inventory reconciliation data are within allowable

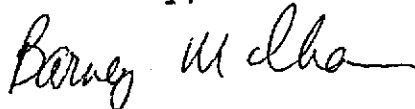
Mr. Marty Ryder
Pacific Bell, 1189 58th St.
October 29, 1991
Page 2 of 2

variations. Said statement shall be executed under penalty of perjury. In addition, to operate under a valid permit you are required to comply with the conditions as stated in Section 2712 of Title 23 CCR which states:

1. The owner or operator shall comply with the reporting and recording requirements for unauthorized releases as specified in Article 5 of T23.
2. Written records of all monitoring and maintenance performed shall be maintained at a readily available location, for a period of at least three (3) years and these records must be made available within 36 hours upon request from a representative from this office.
3. Within 30 days of receiving an inspection report from the local agency, the permit holder shall implement the corrections specified in the inspection report. Please note the local agency shall take appropriate enforcement action pursuant to section 25299 of the Health and Safety Code if the owner or operator fails to comply with the monitoring requirements specified in Article 3 or 4 or the reporting requirements specified in Article 5.

Please specify which monitoring alternative will be implemented at this site so as to expedite the issuance of a five year operating permit for the underground tank. You may contact me at (510) 271-4320 should you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: Mr. L. Beesley, Pacific Bell, Fleet Sup., 1206 5th St., Berkeley,
CA, 94710
Mr. C.H. Vellenoweth and Mr. R.A. Ebert, Pacific Bell, 1189 58th
St., Oakland, CA 94621
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